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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In re Petition of)
)
Cavalry Chapel of Twin Falls, Inc.)
Creative Educational Media Corp., Inc.) RM-10609
Positive Alternative Radio, Inc)
Priorities Radio, Inc)
)
)
To Amend Part 74 of the Commission's)
Rules to Permit Satellite Feeds to)
Noncommercial Educational FM Translators)
Operating on Commercial Frequencies)

To: The Commission

COMMENTS

The National Translator Association, a national association of owners and operators of radio and television translator stations throughout the United States, both commercial and noncommercial, hereby submits its comments on the above-referenced Petition for Rulemaking. Filed simultaneously with these comments is a request for leave to file late-filed comments.

The National Translator Association is dedicated to maximizing the availability of free over-the-air TV and FM radio service in all geographical areas. Our membership is made up of owners and operators of TV and FM translators, including local governments

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and special tax districts, service organizations, and others concerned with the Association's objectives.

It is our opinion that the time is at hand to revisit the FM translator rules in their entirety, rather than to modify the one provision as requested by the petitioners. The adoption of the Low Power FM rules has placed new demands on the available spectrum. Then the adoption of digital FM radio, which has signal components in both adjacent channels, raises serious questions about how FM translators are going to continue to fulfill their function. It is time to examine how FM translators will avoid interference with digital FM stations, as well as how they will cope with rebroadcasting digital signals. There is a serious question about how a significant portion of the current FM translators will be able to remain in operation with digital FM stations using three times the spectrum per station.

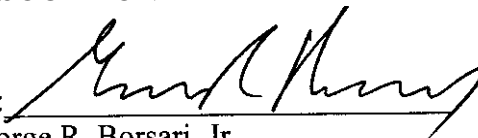
There are certain provisions in the FM translator rules which are routinely waived. It is time to codify these technically acceptable modes of operation. It is already past time to reexamine the interference ratios, and we cannot continue to live with the inefficiencies of interference calculations based on the F50/50 and F50/10 curves which fail to **take** into account terrain obstructions beyond 16 km. A plan must be put in place which takes account of the terrain along the full path from the transmitter to the analysis point, comparable to the plan for television in Office of Engineering Technology Bulletin **69**.

Thus, the National Translator Association strongly recommends that the question of allowing satellite feeds to noncommercial translators operating on channels in the commercial part of the FM band be considered as one element in **an** omnibus proceeding.

This will allow the Commission to better balance the conflicting requirements of various
types of FM translator users.

Respectfully submitted,

NATIONAL TRANSLATOR
ASSOCIATION

By: 

George R. Borsari, Jr.,
Its Counsel

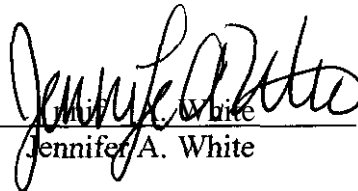
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February 12, 2003

CERTIFICATE OF SERVICE

I, Jennifer A. White, an employee of the law firm Borsari & Paxson, do hereby certify that a true copy of the foregoing COMMENTS has been sent, via First Class U.S. Mail, postage prepaid, this 12th day of February, 2003, to the following:

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Jennifer A. White